

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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**G.M.M., A MINOR CHILD
BY HIS MOTHER AND NATURAL GUARDIAN,
NIKI HERNANDEZ- ADAMS, AND
NIKI HERNANDEZ-ADAMS, INDIVIDUALLY**

Plaintiff,

-against-

MARK KIMPSON

Defendant,

13-CV-05059

**DEFENDANT'S
ANTICIPATED
TRIAL EXHIBITS**

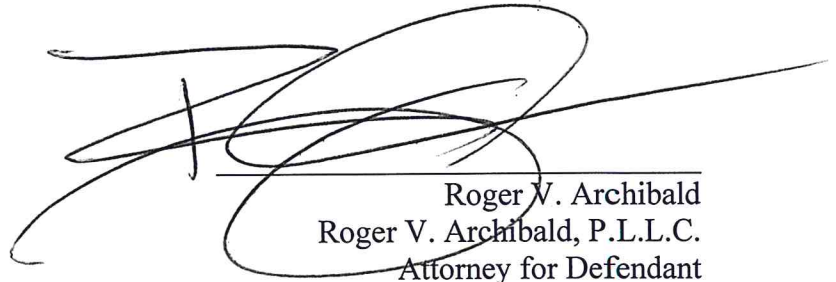
Exhibits

- A. A report by Freddie Marton, MD, FAAP, dated June 26, 2014, of neurological evaluation (Independent Medical Examination) performed on the infant Plaintiff, G.M.M., demonstrating that G.M.M. has no focal neurological deficits and abnormalities.
- B. A report by Dominick Auciello, Psy.D., dated May 8, 2015, based on a neuropsychological testing of G.M.M., and an interview with G.M.M.'s mother, Ms. Hernandez-Adams, on August 1, 2011, opining on the factors, including G.M.M.'s lack of treatment for otitis media, excessive levels of bilirubin during early infancy, and how G.M.M.'s parents' refusal to administer standard vaccinations, that contributed to the infant G.M.M.'s developmental deficiencies and speech impairments.
- C. A building inspection report, dated May 18, 2015, and a photo inspection report, dated May 15, 2015, by Bryan E. Flynn, P.E., based on a building inspection

conducted on May 15, 2015, opining on the quality of the rehabilitation construction work done at 490 MacDonough Street, Brooklyn, NY 11233 and whether same was in accordance with the engineering and construction industry design standards; and further opining on the encapsulation of lead paint and lead-safe versus lead-free rehabilitation construction.

- D. A report by Arthur A. Morales, Lead Inspector, dated February 4, 2015, opining whether the positive reading of lead paint may be attributable to “reading thru” the drywall, and whether the presence of lead-based paint can contaminate household dust if there is lead paint on a potential friction surface.
- E. A report by Bernard F. Lentz, Ph.D., dated April 17, 2015, opining on the credibility and accuracy of the techniques and theories employed by the Plaintiffs’ Forensic Experts, Kristin K. Kucsma, M.A. and Frank D. Tinari, Ph.D. at the Sobel Tinari Economics Group.
- F. A report by Charles A. Kincaid, Ph.D., dated April 14, 2015, opining on the factors, including G.M.M.’s lack of treatment for otitis media, excessive levels of bilirubin during early infancy, and how G.M.M.’s parents’ refusal to administer standard vaccinations, that contributed to the infant G.M.M.’s developmental deficiencies and speech impairments.
- G. Deposition transcripts of Plaintiff Niki-Hernandez-Adams taken on June 25, 2014 and October 1, 2014.
- H. Deposition transcripts of Joshua Mendez taken on June 25, 2014 and October 1, 2014.

Dated: Brooklyn, New York
June 16, 2015

A large, stylized handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

Roger V. Archibald
Roger V. Archibald, P.L.L.C.
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